

Meghan Claiborne

From: Chris McInerney <cmcinerney@themalonefirm.com>
Sent: Monday, February 15, 2021 3:50 PM
To: Meghan Claiborne
Cc: Thomas Malone
Subject: RE: Wexler v. City, et al. - O'Reilly Deposition
Attachments: 15FEB21 NoD to Keenan.pdf; 15FEB21 NoD to Koenig.pdf

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Confirmed.

I've attached notices for Detective Koenig for 2/17 at 1 P.M. and Corporal Keenan for 2/18 at 10 A.M.

Thanks,
Chris

From: Meghan Claiborne [Meghan.Claiborne@Phila.gov]
Sent: Monday, February 15, 2021 3:14 PM
To: Chris McInerney
Cc: Thomas Malone
Subject: RE: Wexler v. City, et al. - O'Reilly Deposition

Confirmed. Please see the attached notice of Deposition for Plaintiff for tomorrow following the conclusion of Officer O'Reilly's deposition. Please confirm.

Thank you,
Meghan

From: Chris McInerney <cmcinerney@themalonefirm.com>
Sent: Monday, February 15, 2021 1:35 PM
To: Meghan Claiborne <Meghan.Claiborne@Phila.gov>
Cc: Thomas Malone <tmalone@themalonefirm.com>
Subject: Wexler v. City, et al. - O'Reilly Deposition

External Email Notice. This email comes from outside of City government. Do not click on links or open attachments unless you recognize the sender.

Good afternoon,

I'm writing on behalf of Mr. Malone to confirm tomorrow's deposition of Officer O'Reilly at 10 A.M. via Zoom (for which the notice is attached), and to confirm that we'll be using your court reporter.

Please provide us with the reporter's information and the link to the Zoom meeting at your earliest convenience.

Best,
Chris McInerney
Paralegal, The Malone Firm

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

TZVIA WEXLER	:	
<i>Plaintiff</i>	:	Civil Action
	:	
v.	:	
	:	No. 19-5760
CHARMAINE HAWKINS, et al.	:	
<i>Defendants</i>	:	

NOTICE OF DEPOSITION DIRECTED TO CORPORAL KELLY KEENAN

NOTICE is hereby given that pursuant to Rule 30 of the Federal Rules of Civil Procedure, Plaintiff, by and through her attorney, Thomas Malone, Esq., will take the oral deposition of **Corporal Kelly Keenan**. The deposition will begin at **10 A.M on February 18, via Zoom**, unless the parties mutually agree to hold the deposition on a different date or time or at a different location or using different means.

This deposition will be taken by stenography before an officer authorized to administer oaths and, if necessary, will continue from day to day until completed. The deposition will be taken for the purposes of discovery, for use at trial in this matter, and for any other purpose permitted under the Federal Rules of Civil Procedure.

Dated: February 15, 2021

/s/ Thomas Malone
Thomas Malone, Esq.
Attorney for Plaintiff

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

TZVIA WEXLER	:	
<i>Plaintiff</i>	:	Civil Action
	:	
v.	:	
	:	No. 19-5760
CHARMAINE HAWKINS, et al.	:	
<i>Defendants</i>	:	

NOTICE OF DEPOSITION DIRECTED TO DETECTIVE JAMES KOENIG

NOTICE is hereby given that pursuant to Rule 30 of the Federal Rules of Civil Procedure, Plaintiff, by and through her attorney, Thomas Malone, Esq., will take the oral deposition of **Defendant James Koenig**. The deposition will begin at **1 P.M. on February 17, via Zoom**, unless the parties mutually agree to hold the deposition on a different date or time or at a different location or using different means.

This deposition will be taken by stenography before an officer authorized to administer oaths and, if necessary, will continue from day to day until completed. The deposition will be taken for the purposes of discovery, for use at trial in this matter, and for any other purpose permitted under the Federal Rules of Civil Procedure.

Dated: February 15, 2021

/s/ Thomas Malone
Thomas Malone, Esq.
Attorney for Plaintiff